



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 27, 2020

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re:     *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)***

Dear Judge Nathan:

We write to provide the Court with the parties' agreed-upon list of people and entities who may be named at trial. We will submit a Microsoft Word version directly to chambers.

**People**

1. Mildred Benavides
2. Matthew Blair
3. Richard Bleich (pronounced blyge)
4. Robert Clifton Burns
5. Mustafa Cetinel (pronounced chetinull)
6. Ekrem Cinar
7. Alessandra Conte
8. Mark Dubowitz
9. Christopher Earley
10. Crina Ebanks
11. Linet Estiroti
12. Ahmad Farshchian
13. Luis Fuenmayor
14. Alexander Frei
15. Hamidreza Ghanbari
16. Mehdi Hadavand
17. Christian Kalin
18. Bahram Karimi
19. Richard Kauffman
20. Farshid Kazerani
21. Ted Kim

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22. Robert Klingensmith
23. Luca Marchetti
24. Reza Moayed
25. Talya Nevins
26. Matthew Nelson
27. Peyman Ojian
28. Jose Luis Parada Sanchez
29. Trita Parsi
30. Robert Peri
31. Amir Ashraf Pourdeljou
32. Luis Rivera
33. Sandra Santiago Rodriguez
34. Ali Sadr Hashemi Nejad
35. Mohammad Sadr Hashemi Nejad
36. Negarin Sadr Hashemi Nejad
37. Pegah Sadr Hashemi Nejad
38. Ahmad Safavardi
39. Gabriela Sanchez
40. Urs Schneider
41. Faramarz Shadloo
42. Ebrahim Shariat
43. Hojatollah Soltani (Ambassador)
44. Hossein Soltani
45. Abbas Taheri Gharagozlou
46. Hossein Tehrani
47. Oliver Volz
48. Nazgol Zand
49. Behrooz Zangeneh

### **Entities**

1. Alper Insaat
2. Citibank
3. Clarity Trade & Finance
4. Desarrollos Urbanos de la Costa Oriental del Lago, S.A. or DUCOLSA
5. Emirates National Bank of Dubai or Emirates NBD
6. Export Development Bank of Iran
7. Hyposwiss Bank
8. Iranian International Housing Co. C.A. or IIHCO or IIHC
9. JPMorgan Chase Bank
10. Nueva Ciudad Fabricio Ojeda or Nueva Ojeda Housing Development Project
11. Oriental Oil Kish or Kish Oriental Oil
12. Petróleos de Venezuela, S.A. or PDVSA
13. Samaneh Stratus Co.
14. Stratus Holding Group

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15. Stratus International Contracting Company

16. Stratus International Contracting Insaat Ve Taahhut or Straturk Insaat ve Taahhut

17. Stratus-Global Investments

Respectfully submitted,  
GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_ /s/  
Jane Kim / Michael Krouse / Stephanie Lake  
(212) 637-2038 / 2279 / 1066  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney

cc: Defense Counsel (by ECF)